Responses to Comments in Letter 146 from John van Dongen, Legislative Assembly of British Columbia

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the preceding comment letter.

1. Thank you for your comments. Specific issues are addressed below.

2. Please see Letter 3 for a discussion of potential air quality impacts and health issues associated with the proposed project. In addition, Letter 49, Response to Comment 7 provides a discussion of potential visibility issues associated with the proposed project.

   The applicant has noted several reasons for the siting decision including proximity to areas of growing electricity demand, interconnections to existing transmission facilities, proximity to existing natural gas pipelines, availability of industrially zoned property, and the availability of water (Exhibit 155, pages 8 and 9).

3. See Letter 3, Response to Comment 4 regarding EMF health effects.

4. It is unclear what the commentor means about how the power line would be expected to affect provinces that it does not pass through. An Environmental Assessment Report for the 230 kV Electric Transmission Line from Sumas to the BC Hydro Clayburn Substation was prepared by Norecol Dames & Moore in 1999. Please also see Letter 3, Response to Comment 4 regarding EMF health effects.

5. See Letter 3, Response to Comment 4 regarding EMF health effects.

6. Please see General Response B.

7. Please see Letter 5, Response to Comment 5 and Letter 107, Response to Comment 22 for a discussion of noise impacts associated with the proposed project. Audible noise from transmission lines or "corona" increases with foul weather, decreasing conductor diameter, increasing voltage, and decreasing number of conductors per phase. The proposed 230 kV transmission line will consist of double bundle conductors with corona rings on the insulator assemblies. As a result, it is anticipated that noise levels due to the transmission lines will be below the maximum levels allowed by local regulations (Norecol Dames & Moore 1999).

8. See Letter 107, Response to Comment 26.

9. Although it was assumed in the Application for Site Certification and the Draft EIS that the existing agreement between the Cities of Abbotsford and Sumas for wastewater discharge could be revised to accommodate additional wastewater from SE2, Abbotsford has since advised that they are not amenable to such a change. Accordingly, SE2 has refined their proposed design to greatly reduce the volume of the plant's wastewater discharge, and the City of Sumas has agreed to accept a combined discharge from the Sumas 1 and SE2 plants that does not exceed 80,000 gallons per day, the amount that

Sumas 1 is currently permitted to discharge (see Volume 1, Appendix G, Exhibit 6, Settlement Agreement Between Washington Department of Ecology and Sumas Energy 2).

10. Temperature of the wastewater discharge from the JAMES treatment facility is not an issue due to the residence time of the wastewater in the treatment facility. The total SE2 wastewater discharge would constitute less than 1 percent of the total waste flow to the JAMES treatment facility which would immediately dilute any elevation in temperature to a less than significant level.

11. The quantity of wastewater that the JAMES treatment facility has previously agreed to accept from the City of Sumas, including SE2 wastewater, would not be changed as a result of the proposed project.

12. The quality of cooling tower blowdown water that would make up most of the SE2 wastewater stream is expected to contain about 1,600 mg/l of total dissolved solids concentrated from elements in the source water. The quality of the wastewater would be required to meet the Sumas-Abbotsford-Fraser Valley Regional District (FVRD) wastewater agreement and ordinances with regard to wastewater quality. The concentrations of salts in the SE2 wastewater are not expected to be high enough to cause harm to the water quality of the Fraser River.

    The chemical constituents of the wastewater discharge from SE2 would be similar to those discharged from SCCLP, as tabulated in the Application for Site Certification, Table 2.8-2. The wastewater discharge leaving the plant would meet all applicable standards for public sewer systems and would be treated prior to release from the JAMES facility.

13. Based on an analysis by Robinson & Noble (2000), the increased pumping for this project could theoretically result in an increase in drawdown of the aquifer on the Canadian side of the border in an area near the Sumas municipal well field. However, there is not sufficient information to conclude whether such drawdown would be consequential to any specific groundwater user. Accordingly, we have included a recommendation in the Final EIS that SE2 should provide mitigation for any Canadian wells where groundwater pumping to supply water to S2GF impairs the functionality of an existing water well. However, as discussed in General Response D, it appears that perceptible changes in water levels should only be expected to result from interference drawdown, at least for the foreseeable future.

14. The plant is being proposed for a site in Sumas because SE2 considers it an expansion of the existing 125MW SCCLP, as outlined in Chapter 2 of the EIS. The location of the facility is based on size, proximity to available utilities and gas pipeline easement, compliance with City of Sumas zoning and comprehensive plans, access to the site, and availability of the property. In addition, the Washington Administrative Code states:

    "*When a proposal is for a private project on a specific site, the lead agency shall be*

required to evaluate only the no action alternative plus other reasonable alternatives for achieving the proposal's objective on the same site." (WAC 197-11-440 (5)d).